

IN THE UNITED STATES BANKRUPTCY COURT  
FOR THE NORTHERN DISTRICT OF ILLINOIS  
EASTERN DIVISION

IN THE MATTER OF: ) IN CHAPTER 7  
 )  
PACKAGING ADVANTAGE, INC., ) 16-24295  
 )  
Debtor(s). )

**NOTICE**

TO: Office of the United States Trustee – Service through CM/ECF  
Mr. Robert Rotman – Service through CM/ECF  
Mr. John Sheldon – Service through CM/ECF  
Mr. Elliot Wizcer – Service through CM/ECF  
See Attached Service List – Service through US Mail

PLEASE TAKE NOTICE that on the 28th day of September, 2018 at the hour of 11:00 a.m. or as soon thereafter as counsel may be heard, I shall appear before the Honorable JANET S. BAER, Bankruptcy Judge, at the Kane County Courthouse, 100 South Third Street, Courtroom No. 240, Geneva, Illinois, or before such other Judge as may be sitting in her place and stead, and then and there present the attached Application, at which time and place you may appear, if you so see fit.

/s/GINA B. KROL  
\_\_\_\_\_  
GINA B. KROL  
105 W. Madison St., Suite 1100  
Chicago, IL 60602  
312/368-0300

STATE OF ILLINOIS )  
 ) SS  
COUNTY OF COOK )

GINA B. KROL, being first duly sworn on oath, deposes and states that she served a copy of the foregoing Notice together with a copy of the Application attached hereto on the persons shown above, via CM/ECF System and/or US Mail, this 29th day of August, 2018.

/s/ GINA B. KROL  
\_\_\_\_\_

Label Matrix for local noticing

0752-1

Case 16-24295

Northern District of Illinois

Chicago

Wed Aug 29 14:23:59 CDT 2018

U.S. Bankruptcy Court

Eastern Division

219 S Dearborn

7th Floor

Chicago, IL 60604-1702

Packaging Advantage, Inc.

470 Fenton Ln.

West Chicago, IL 60185-2667

Source One Staffing, Inc.

136 W. Washington St.

West Chicago, IL 60185-2803

Chase Bank USA

& The Creditors Rights & Bankruptcy

1002 Justin St.

Wilmington, DE 19801-5148

5th/3rd Mortgage Co.

& Codilis & Associates

15W0300 N. Frontage Rd.

Burr Ridge, IL 60527-6921

Bank of America

& Phillips & Cohen Associates

1002 Justison St.

Wilmington, DE 19801-5148

Christine Scott

42W283 Jens Jensen Ln

Saint Charles, IL 60175-8205

Christina Scott

42W283 Jens Jensen Ln

Saint Charles, IL 60175-8205

Christine Scott

42W 283 Jens Jensen Ln

St Charles, IL 60175-8205

Christine Scott

42W283 Jens Jensen Ln

Saint Charles, IL 60175-8205

Cynthia Sedan

21260 Country Squire Ln

Dubuque, IA 52001-8000

Cynthia Sedan

PO Box 6565

Galena, IL 61036-6565

Davis McGrath, LLC

125 S Wacker Dr Ste 1380

Chicago, IL 60606-4402

Dorothy Curtis

PO Box 3074

Saint Charles, IL 60174-9098

Dorothy Curts

1011 Indiana Ave

Saint Charles, IL 60174-3141

Estate of Richard Swanson

& John Biallas, Atty. at Law

3N918 Sunrise Ln

Saint Charles, IL 60174-5081

First National Bank of Omaha

Attn: Rosemary More

PO Box 3773

Omaha, NE 68103-0773

Hector Vega

1217 Kings Ct Apt 22

West Chicago, IL 60185-4332

Hickory Ridge Townhouse Associates

& Paul A. Kreig, Atty at Law

226 W. Judd St.

Woodstock, IL 60098-3158

Jeffrey S Harris

1701 S First Ave

#202

Maywood IL 60153-2400

Nancy Rasmussen

21 Butternut Ln

Galena, IL 61036-9556

Nancy Rasmussen

21 Butternut Ln

Galena, IL 61036-9556

Northwestern Medical Occupational Health

25 N Winfield Rd

Winfield, IL 60190-1222

Pearl A Marziani

d/b/a Marziani Enterprises

c/o Gini S Marziani

125 S Wacker Drive

Chicago IL 60606-4424

Pearl Marziani d/b/a Marziani Enterprise

100 Hahndorf Rd Ste 101

West Chicago, IL 60185-5175

Richard Swanson

7012 County Road 6

Florence, AL 35633-4728

Rotman & Rotman LTD

134 N La Salle St Ste 200

Chicago, IL 60602-1056

The Mayo Clinic

200 1st St. SW

Rochester, MN 55905-0001

The Private Bank & Trust Co.

& Lebow, Malecki & Tasch, LLC

903 Commerce Dr. Ste. 160

Oak Brook, IL 60523-8830

Wiczer & Sheldon

500 Skokie Blvd Ste 325

Northbrook, IL 60062-2887

Gina B Krol  
Cohen & Krol  
105 West Madison St Ste 1100  
Chicago, IL 60602-4600

Patrick S Layng  
Office of the U.S. Trustee, Region 11  
219 S Dearborn St  
Room 873  
Chicago, IL 60604-2027

Robert D. Rotman  
Rotman & Rotman, Ltd.  
134 N LaSalle St. Ste 200  
Chicago, IL 60602-1056

The following recipients may be/have been bypassed for notice due to an undeliverable (u) or duplicate (d) address.

(d) Packaging Advantage Inc  
470 Fenton Ln  
West Chicago, IL 60185-2667

(d) Source One Staffing, Inc.  
136 W Washington St  
West Chicago, IL 60185-2803

(u) Alan D Lasko  
Alan D. Lasko & Associates, P.C.

(u) Christine Scott

(u) Cynthia Sedan

(u) Dorothy Curts

(u) Nancy Rasmussen

(u) Pearl Marziani

(u) Richard Swanson

End of Label Matrix	
Mailable recipients	32
Bypassed recipients	9
Total	41

IN THE UNITED STATES BANKRUPTCY COURT  
FOR THE NORTHERN DISTRICT OF ILLINOIS  
EASTERN DIVISION

IN THE MATTER OF: ) IN CHAPTER 7  
 )  
**PACKAGING ADVANTAGE, INC.,** ) No. 16-24295  
 )  
Debtor(s). )

**TRUSTEE'S APPLICATION TO SELL CAUSE OF ACTION**

TO THE HONORABLE **JANET S. BAER**  
BANKRUPTCY JUDGE

Now comes **GINA B. KROL**, Trustee herein, and respectfully represents unto this Honorable Court as follows:

1. She is the duly appointed, qualified and acting Chapter 7 Trustee in the above-entitled proceeding.
2. Prior to the filing the Debtor and Source One were engaged in litigation. In that litigation, Source One alleged that the Debtor's principals, Dorothy Curtis and Nancy Rasmussen breached their fiduciary duties and made unlawful distributions to themselves and or insiders.
6. Source One has urged the Trustee to take on that litigation in an effort to recover additional funds for the creditors of this Estate. The Trustee does not believe it's in the best interests of the Estate to expend Estate funds to pursue this litigation.
7. The Trustee has negotiated a sale of that cause of action with Source One where Source One would pay the Estate the sum of \$7,000.00 to purchase all of the Estate's interest in that cause of action and reduce its duly filed general unsecured Claim #6 from \$639,851.96 to \$468,000.00. The reduction in the amount of the claim would result in a greater monetary distribution to other creditors of this Estate.

8. The Trustee believes that the sale of this litigation to Source One results in a benefit to the Estate without the risk of expense or loss and that acceptance of this offer is in the best interests of creditors herein.

9. The Trustee recommends the acceptance of the \$7,000.00 from Source One. The Trustee makes no representations or warranties of any kind with respect to value or validity of this cause of action.

10. If approved the sale will result in a meaningful dividend to creditors of this Estate.

**WHEREFORE**, GINA B. KROL, Trustee herein, prays for the entry of an Order authorizing the Trustee to sell the Debtor's right, title and interest in litigation against Dorothy Curtis and Nancy Rasmussen for alleged breach of fiduciary duties and improper distributions to Source One for the sum of \$7,000.00 , without representations or warranties of any kind as to value or validity of these claims; and as additional consideration, Source One's general unsecured Proof of Claim #6 will be reduced to \$468,000.00 and for such other and further relief as the Court shall deem proper.

**GINA B. KROL, Trustee**

GINA B. KROL  
COHEN & KROL  
105 W. Madison St., Suite 1100  
Chicago, IL 60602  
312/368-0300

BY: /s/ Gina B. Krol  
One of Attorneys for Trustee